

This evening, you will be told that this Local Plan is better than no plan. We, along with many other parish councils and local residents, strongly disagree. In its current form, the plan is unsound. Our justified and detailed position is set out on our website at ombparish.gov.uk but three key reasons are:

- 1) It is not effective. The much-anticipated Viability Report finds just three sites - representing one-fifth of the homes proposed in strategic locations - are considered viable. Even these are only rated Amber, while every other site is rated Red. The report also recommends nine separate areas of work to be completed before submission. The planning authority's response is that *"it will continue to refine its understanding of viability before submission."*

But Regulation 19 is not about refining viability. At this point, the planning authority must be confident that the proposed sites are deliverable and viable. The evidence strongly shows otherwise and the Plan therefore fails a key test of soundness.

- 2) The plan is **not justified** because of significant flaws in the Green Belt Review. Arup's assessments of land parcels around LEA 1 and LEA 2 are inaccurate and misleading. We commissioned a separate, independent review from Land Use Consultants. Their assessment concluded that the land north of Leamington is Green Belt, not Grey Belt.

When we asked why their findings differed so greatly from Arup's, they identified a critical methodological issue. Arup's broad land parcels include developed land, which reduces the perceived openness of the areas being evaluated. In effect, the green belt has been 'diluted'. These technical

findings are buried within hundreds of pages of documentation and have received little scrutiny. As a result, the term “Grey Belt” is now being widely adopted despite LEA 1 and LEA 2 being wholly Green Belt and other alternatives have not been transparently assessed.

- 3) Thirdly, the plan is not consistent with national policy, either the NPPF or Defra’s Land Use Framework. Just last Friday in a parish councillors’ briefing, we were told that development on Best and Most Versatile agricultural land has been avoided. This is incorrect. LEA 1 and LEA 2 are Grade 2 and Grade 3a farmland, so they are both Best and Most Versatile land. The tenant farmer there grows high quality wheat and oats for major national manufacturers, alongside sustainable cover-cropping.

Contrary to national policy, the allocation of these sites therefore endangers food security and fails to protect tenant farms. Neither does it give due weight to the economic and other benefits of BMV land. Another failure is that the planning authority has not undertaken a sequential test in respect of the decision to develop this land.

We have raised these concerns consistently over the past five years. There is however little evidence they have received the conscientious consideration required by consultation law. Given the unresolved issues, the continuing release of technical evidence, and the need for further work, pushing ahead at this stage risks failure at examination.

We urge you to take full account of these material considerations and prepare a plan that is genuinely fit for purpose.